

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

HESTAL LIPSCOMB,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 05-477 SLR
)	
ELECTRONIC DATA SYSTEMS)	
CORPORATION,)	
a Delaware Corporation,)	
)	
Defendant.)	JURY TRIAL DEMANDED

TO: Alyssa M. Schwartz, Esquire
Richards, Layton & Finger, P.A.
920 King Street, P.O. Box 551
Wilmington, DE 19899-0551

RE-NOTICE OF DEPOSITION

Pursuant to Fed. R. Civ. P. 30(b)(6), plaintiff will take the deposition of defendant, Electronic Data Systems Corporation (“EDS”) on April 12, 2006 at 3:00 p.m. at the offices of Smith Katzenstein & Furlow, LLP, 800 Delaware Avenue, 7th Floor, Wilmington, DE 19899. The person designated to testify on behalf of the EDS shall testify as to matters known or reasonably available to EDS with respect to the following issues:

1. The policies, procedures and practices of defendant and its third-party administrator with respect to FMLA leave for defendant’s employees.
2. The working relationship between defendant and its third-party administrator regarding FMLA leave for defendant’s employees.

3. The defendant's decision making process with respect to the plaintiff's request for FMLA leave.

4. The defendant's decision making process with respect to its decision to terminate plaintiff.

5. The defendant's document production and privilege log in this case.

6. All aspects of Roberta McWilliams' employment with defendant, including, but not limited to, her dates of employment, positions held, last known address and other contact information and the reason(s) for her termination.

SMITH, KATZENSTEIN & FURLOW LLP

/s/ Laurence V. Cronin

Laurence V. Cronin (#2385)
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Attorneys for Plaintiff

April 5, 2006

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of April 2006, I caused a copy of the foregoing
RE-NOTICE OF DEPOSITION to be served on the following counsel of record via e-filing:

Alyssa M. Schwartz, Esquire
Richards, Layton & Finger, P.A.
920 King Street, P.O. Box 551
Wilmington, DE 19899-0551

/s/ Laurence V. Cronin
Laurence V. Cronin (ID No. 2385)